**EPSTEIN & WEIL LLC** 

ATTORNEYS AT LAW (212) 732-4888

225 Broadway New York, NY 10007 LLOYD EPSTEIN JUDITH H. WEIL



October 28, 2020

Via Email Failla NYSDChambers@nysd.uscourts.gov and ECF Hon. Katherine Polk Failla United States District Judge 40 Foley Square New York, NY 10013

Re: United States v. Kowan Poole
Dkt. No. 20-Cr-3 (KPF)
Request to Modify Conditions of Bond

Dear Judge Failla:

This is a request for a bond modification with the Government's consent.

Mr. Poole is currently on home incarceration. I request that Mr. Poole be permitted to leave his home for the purpose of seeking employment. The conditions under which Mr. Poole will be permitted to leave his apartment to seek employment will be extremely limited. Mr. Poole must first notify his and receive permission from his Pretrial Services Officer and will only be allowed to seek employment between the hours of 10:00 a.m. and 5:00 p.m. Once Mr. Poole finds employment, he will only be allowed to leave his apartment for the purposes of work, again subject to the permission of his Pretrial Services Officer. Mr. Poole will remain subject to GPS monitoring.

Mr. Poole lives in Washington, D.C. and, as the Court surely recalls, was placed on home incarceration in July, 2020, after he had violated a condition of his release by traveling outside of the D.C. region. Mr. Poole has complied with all of his conditions of release since July and understands that, if the Court grants this application, the new conditions will be strictly enforced.

I have spoken to AUSA Alexander Li, and Pretrial Services Officer Copes in Washington, D.C., both of whom consent to this modification.

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Please feel free to have your Chambers call me if you have any questions.

Sincerely,

Lloyd Epstein

LE:pc

cc. AUSA Alexander Li (Via Email <u>Alexander.Li@usdoj.gov</u> and ECF)

Mr. Kowan Poole (Via Email Kowanpoole@yahoo.com)

Application GRANTED.

Dated: October 28, 2020

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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